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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID CONVERSE HARRIS,

Defendant.

FELONY COMPLAINT

MAGIS NO. 2:23mj1032-DAO

VIOS. COUNT 1, 18 U.S.C. § 2113(a),  
BANK ROBBERY.

**COUNT 1**

(Bank Robbery)  
18 U.S.C. § 2113(a).

On or about October 31, 2023, in the District of Utah,

**DAVID CONVERSE HARRIS,**

the defendant herein, by force, violence, and intimidation did take from the person and presence of others, employees of the Brighton Bank located at 93 West 3300 South, City of South Salt Lake, Utah, U.S. Currency, belonging to and in the care, custody, control, management, and possession of the Brighton Bank, a bank whose deposits are and on the

date of the robbery were then insured by the Federal Deposit Insurance Corporation (FDIC); all in violation of 18 U.S.C. § 2113(a).

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

This complaint is based on the following information:

I, Jeremiah W. Fowlke, being first duly sworn, depose and say:

1. Your affiant is a Special Agent with the Federal Bureau of Investigation currently assigned to the Violent Crimes squad in the Salt Lake City field office. The information contained in this complaint is based on an investigation conducted by me along with other Special Agents of the FBI and investigators from the South Salt Lake City Police Department.
2. On 10/31/2023, at around 15:47 hours, an unidentified male entered and robbed the Brighton Bank located at 93 West 3300 South in the City of South Salt Lake, Salt Lake County, Utah. Upon entering the bank, the suspect passed the teller a robbery note that stated, "Money in till, now! Do not alert anyone! No one needs to be hurt right? Wait until I leave to contact authorities." The suspect received US Currency from the teller along with a dye pack that exploded shortly after the suspect left the bank. The suspect then fled the scene in a blue Chrysler 200 with a Utah license plate of 88AJ3.
3. A records check of Utah license plate 88AJ3 returned to a Charles Edson. South Salt Lake Police Detectives spoke with Charles over the phone. Charles stated he is an Uber driver and confirmed he picked up a passenger on 10/31/2023 around

the time of the bank robbery from Demolition Games located at 85 West 3300 South, South Salt Lake, which is in the same plaza as Brighton Bank. He then drove the suspect to 258 West 700 South, Salt Lake City. Charles stated he noticed the passenger he gave the ride to had red dye on his hands and jacket and smoke billowing out of his right jacket pocket. Charles stated he told the passenger he couldn't get in his vehicle with smoke billowing out of his jacket pocket and to get rid of whatever was causing the smoke. Charles stated the passenger threw something out of his right jacket pocket onto the ground before entering his vehicle. A dye pack of bait money was found at the location the Ube driver discuss and in the Brighton Bank parking lot.

4. On 11/01/2023, FBI Special Agent Jeremiah Fowlke shared the surveillance pictures from the robbery in a County-wide Detective chat group in hopes of identifying the suspect, who did not wear a mask during the bank robbery. A Taylorsville Detective positively identified the suspect as David Converse Harris, which he had recent contact with him. David is also currently on probation with Adult Probation & Parole (AP&P) for five recent convictions as of 12/02/2022 for Robbery and Aggravated Robbery involving a firearm. Harris' last known, self-documented address with AP&P is 258 West 700 South, Salt Lake City. This is the same address the Uber driver had driven the suspect to right after the robbery. Additionally, several AP&P Agents who are familiar with Harris positively identified him as the same person in the bank's surveillance photographs.

5. On 11/02/2023, South Salt Lake Police Detectives and Special Agents with the FBI received information that David Harris was at the Discovery Inn located at 380 West 7200 South in the City of Midvale. Harris was spotted leaving the Discovery Inn by Special Agent Fowlke and getting into a silver Lexus SUV with another unknown passenger. As investigators moved in to apprehend Harris, he fled in the Lexus, nearly striking two investigators who were in their vehicles with their lights and sirens activated attempting to stop Harris. As Harris fled from law enforcement, additional Detectives made eye contact with Harris in the driver seat of the Lexus and were able to positively identify him as David Converse Harris. The chase became too dangerous to continue and officers called off the chase.
6. A short time later, another bank robbery was committed at the Chase Bank located at 1285 East 3900 South in the City of Millcreek. Detectives reviewed the bank's surveillance video, which showed David Harris committing the bank robbery wearing the same clothing that he was wearing when he exited the Discovery Inn a few hours prior. In this robbery, Harris again approached the teller counter, passed a note, and left with US Currency provided by the teller.
7. It was later learned that the Lexus Harris was driving was borrowed from a female with whom Harris knew. The female state she loaned Harris the vehicle, but he never brought it back and wanted to list the vehicle as stolen. The female also stated that Harris left his backpack in her apartment when he took her Lexus. Inside of the backpack was a bank robbery note.

8. On 11/03/2023, South Salt Lake Police Detectives were advised by Salt Lake City Police Department that the same stolen Lexus fled from them in the parking lot of the Metropolitan Inn located at 524 South West Temple Street, Salt Lake City. Detectives arrived at the Metropolitan Inn, identified the room Harris was in and made contact with Harris' brother, Aquaide Marchetti, and a female in the room, Chelsea Lamont. Both Marchetti and Lamont admitted to ingesting drugs with Harris just before left in the stolen Lexus. Marchetti also admitted to a Detective that he had been with Harris when he robbed the Chase bank and was the passenger during the high-speed chase.
9. A short time later, South Salt Lake Police Detectives and FBI Special Agents once again located Harris in Tooele County in the stolen Lexus. A traffic stop was attempted, but Harris again fled and drove through a yard and into a field. He drove through the field and out into oncoming traffic. At this point a large, multi-agency vehicle pursuit ensued throughout Tooele County and proceeded into Salt Lake County. It continued through numerous cities in Salt Lake County during which time Harris avoided several sets of spikes, drove at extremely high rates of speed, drove on sidewalks and into oncoming traffic. After a successful spike attempt, Harris eventually drove onto the Jordan River Parkway Trail, where he crashed into a cement barrier. After he crashed, Harris fled on foot before eventually being taken into custody.
10. At the time of his arrest, Harris appeared to be under the influence of narcotics and was treated by medical personnel prior to being taken to jail.

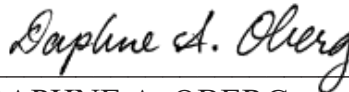
11. Based on the foregoing information, your affiant respectfully requests that a complaint and an arrest warrant be issued for David Converse Harris for a violation of 18 U.S.C Section 2113(a).

Dated this 6<sup>th</sup> day of November 2023.

FOWLKE.JEREMIAH. Digitally signed by  
FOWLKE.JEREMIAH.F49M78K74  
Date: 2023.11.06 10:05:12 -07'00'

Jeremiah W. Fowlke  
Special Agent Federal Bureau of Investigation

Subscribed and sworn to before me, this 6th day of November 2023.



DAPHNE A. OBERG  
United States Magistrate Judge

APPROVED:  
TRINA A. HIGGINS  
United States Attorney

CARLOS ESQUEDA Digitally signed by CARLOS  
ESQUEDA  
Date: 2023.11.06 11:09:14 -07'00'

CARLOS A. ESQUEDA  
Assistant United States Attorney